

EXHIBIT A

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4-17-19

TREATMENT SUMMARY

Client: Shai Segui

This psychologist was appointed by the Court in case FC 2015-004537 to be the Therapist for the minor client, Shai Segui. It is noted that because this psychologist is providing services to both Client and his younger brother, and because many of the themes, allegations and issues are similar for the boys, there will be some similar themes and statements in both treatment summaries that are being provided to the parents today.

Since the last status conference on 2-14-19, this psychologist has regularly met with Client for psychotherapy. Initially the meetings were on a weekly basis, but as this psychologist determined that the therapeutic treatment goals were still vague and Client was functioning relatively well in his current environment (living full-time with Father), this psychologist moved the therapy sessions to every other week. This is obviously a highly disputed case involving very serious allegations. Dr. Ronn Lavit recently completed and submitted a Comprehensive Family Evaluation Report (CFE) to Family Court. This psychologist had originally anticipated that the CFE report, and subsequently any possible findings and rulings by Family Court, would provide a great deal of information and clarity that would continue to inform this treatment process and better clarify the treatment goals. However, this has not been the case. Thus, without a clear answer or determined path of whether any kind of reunification process will occur between children and Mother, including any kind of intensive reunification experience for the family system or graduated parenting time for Mother, etc., this psychologist does not believe it to be ethical or therapeutically beneficial to push any kind of unknown agenda upon Client.

To clarify, Client is functioning relatively well currently in the care of Father – he is doing well in school and he reports his grades are better than they have ever been, he seems socially well-adjusted, he is enjoying playing sports, and he is relatively emotionally stable in his current environment and life-stage while in full custody of Father. Client is not reporting or displaying any significant problems or mental/emotional symptoms currently. Also, Client has made some progress in some areas in counseling (as determined by observation in the counseling sessions), such as developing trust in this therapeutic relationship, developing better frustration tolerance, and making some improvements in healthier expression of emotions and communication in general. In fact, Client has displayed a much healthier communication style with this psychologist over the past several months when discussing past events with Mother – even though he gets angry related to anything about Mother, he is communicating with this psychologist "through" his anger in better ways than in the past. However, his current functioning and improvements are within the context of full custody with Father and zero contact with Mother of any kind. And, because there are no findings contrary to Client's beliefs and stated memories of alleged abuse by Mother, nor is there any determined plan of reintegration or reunification with Mother, there are no clear therapeutic goals related to these possibilities.

With that said, this psychologist has recently addressed some of Client's memories and beliefs about Mother as well as the possibility of some sort of intensive reunification experience between Client and Mother. In fact, this psychologist has recently worked with Client on a list of what he would like to say to Mother and what he would like to address with Mother if/when there is any kind of meeting with Mother. Client's list primarily focuses on asking Mother questions about why she sexually abused (allegedly) Client and why she refuses to admit the truth. Also, Client states that at this point he is willing to attend some sort of intensive reunification experience with Mother (in the past he insisted he would never do this), but he insists he will only participate in a limited way and he does not believe that he will ever have to spend any amount of significant time with Mother, stating he will simply refuse to do so. In fact, Client is so adamant about never spending any significant time with Mother, certainly no parenting time, that he continues to simply state he will run away if he is forced to do so. Client continues to say that he believes Mother will abuse him again (and/or allow others to abuse him) by hitting him or chasing him or sexually abusing him if he spends time with her. His belief is also that Mother does not love or care for him and that she is afraid that if she admits what she did, she will go to jail. He has also said that nobody can force him to spend time with Mother and he does not believe that Mother will ever admit to abusing him.

This psychologist did recently talk to Client again about his memories of this alleged sexual abuse by Mother to again clarify what Client believes occurred. Client stated that he only remembers waking up and realizing that he was lying on top of Mother and that he then went back to sleep. He then woke up again later and Mother was not in the bed anymore. He reports that he does not remember any other specific details about the alleged sexual abuse. He also said that maybe Mother sexually abused him at other times, that he would not be surprised if she did, but he does not remember any other times when Mother may have sexually abused him. It is noted that Client reports that he has said to several other adults, including his teachers at school, that Mother sexually abused him and that is why he does not want to see her or want Mother to be at his school. Thus, this psychologist has empathetically listened to Client and provided him with support regarding his alleged experiences and memories. Additionally, this psychologist has helped Client think about whether it is appropriate or helpful to be expressing to others, for example, his teachers at school, that his Mother sexually abused him. Client's general response to this is that he wants others to know the truth and wants them to understand why he does not

want Mother involved in his life. It is also noted that recently Client stated that while he is willing to attend some sort of intensive reunification experience if it were a day or two, he would not be comfortable going to any camp in another state to do a week-long reunification experience – he states he absolutely refuses to do this.¹

In this psychologist's professional opinion, because there is currently no clarity or determination of any plan for reunification with Mother, this psychologist believes that these themes and this individual psychotherapy work has been exhausted to this point and further repetition with Client, with no determined plan of action for reunification, only frustrates the Client and then he is experiencing high levels of anxiety again without any certainty of a reunification process occurring. Thus, this psychologist questions the ethics of continuing with regular therapy visits around these themes at this point. Again, this is particularly true because when these themes have been the focus in a therapy session, Client continues to espouse the same beliefs and memories of the alleged abuse by Mother (to both him and to his brother). He is then emotionally re-triggered into a state of anger. While Client is doing better at managing these emotions, his "go to" emotion around anything related to Mother is a high level of anger.

In summary, continued psychotherapy sessions that provide a safe and neutral place for Client to process any thoughts, feelings or experiences at this time it is recommended for Client as needed. If a specific plan for any kind of intensive reunification experience is set, or if any kind of reintegration or parenting time with Mother is planned, then this psychologist recommends that Client attend therapy weekly at that point. However, at this point, until there is more clarity around any findings related to the past alleged abuse, or until there is a specific plan of action related to any sort of reunification with Mother, it is recommended that Client utilize counseling services as needed or on a monthly basis to maintain the counseling relationship.

If the parents have any questions or concerns, please contact this provider.

Respectfully Submitted,

Raymond E. Branton, Psy.D. (electronically signed)

4-17-19

Dr. Raymond E. Branton, PsyD Licensed Clinical Psychologist

3

¹ After this recent session, when this psychologist was interacting with Father during check-out, Father also stated that he would not be agreeable to any kind of week-long camp reunification process.